

From: [Michael Carney](#)
To: [emnrd-parkscomments, EMNRD](#)
Subject: [EXTERNAL] EMNRD Proposed Rulemaking Comments
Date: Friday, August 2, 2024 12:51:34 PM

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Hello,

I have a few comments regarding the proposed rulemaking changes.

First:

19.5.1 KK. "Resident" means an individual with a valid state identification card or NM license plate on the vehicle.

"Individual with a valid state identification card" does not limit to New Mexico only. Please amend to specify "individual with a valid NM state identification card", "individual with a valid state identification card showing a NM address", (this would include passports) or some other specification for the ID requirement to actually show residency in NM. Otherwise anyone with any valid ID from any "state" is included in this definition.

Second:

19.5.2 A. 3 (amended) "New Mexico residents are exempt from purchasing day use permits from October 1 through April 30 annually."

19.5.6.10 (amended)

Resident Annual Day Use Pass - \$40 \$75

Non-Resident Annual Day Use Pass - \$150

If the whole point of raising entry fees and other fees is to generate more revenue for the State Parks, then why would you make 7 months of the year free for residents? Further, by doing so you devalue the Resident Annual Day Use Pass to a point where it is more expensive per day than the Non-Resident Day Use Pass. The equivalent cost of the Resident Annual Day Use Pass is now over \$180 when subtracting the 7 months that are fee-free per this amendment.

If the intent is to raise the actual cost of the Annual Day Use Pass in relation to the park system's actual fees, then for parity it should only be \$31.25 per year.

$\$75/12 \text{ months} = \$6.25/\text{month}$

$\$6.25/\text{month} \times 5 \text{ months of paid access} = \31.25

Either reduce the cost of the Resident Annual Pass or don't eliminate day use fees for over half of the year. But whatever you do, don't increase the cost of the pass *and* shorten the amount of time it's good for.

Thank you.

Michael Carney

"I would feel more optimistic about a bright future for man if he spent less time proving that he can outwit Nature and more time tasting her sweetness and respecting her seniority."
- E.B. White